

EXHIBIT 10

UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

JOHNNY M. HUNT,

Plaintiff,

No. 3:23-cv-00243

V.

SOUTHERN BAPTIST CONVENTION;

GUIDEPOST SOLUTIONS LLC; and

EXECUTIVE COMMITTEE OF THE

SOUTHERN BAPTIST CONVENTION,

Defendants.

ORAL AND VIDEOTAPED DEPOSITION OF

CHRISTOPHER BART BARBER

MARCH 19, 2024

*** HIGHLY CONFIDENTIAL PORTIONS ***

ORAL AND VIDEOTAPED DEPOSITION OF CHRISTOPHER BART BARBER, produced as a witness at the instance of the Plaintiff, taken in the above-styled and -numbered cause on the 19th day of March, 2024, A.D., beginning at 9:19 a.m. to 3:00 p.m., before Kelly Hassell, RPR, CLR, CSR, in and for the State of Texas, at the offices of Bradley Arant Boult Cummings LLP, located at Fountain Place, 1445 Ross Avenue, Suite 3600, Dallas, Texas, in accordance with the Federal Rules of Civil Procedure and the agreement hereinafter set forth.

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26 ALSO PRESENT:

27 MS. ERICA TAYLOR - Videographer
28 MR. JOHNNY HUNT (Via Zoom.)

15 Q Okay. Now, without anything other than
16 allegations from , you objected to Pastor
17 Johnny Hunt preaching again after his name appeared in
18 the Guidepost report, did you not?

19 A I objected, yes, to his --

20 Q Okay.

21 A -- restoration to ministry by a church in
22 Florida.

23 Q And you objected despite the fact, sir, there
24 was no proof by a preponderance of the evidence that he
25 been guilty under the allegations of

1 Q some form of sexual abuse, right?

2 MR. PIETSCH: Object to the form.

3 MS. KLEIN: Objection; form.

4 MR. PIETSCH: You can answer.

5 A What he admitted to doing in his fourth
6 statement in response to this I think disqualifies him
7 from pulpit ministry. So, yes, I objected, but not on
8 the basis of the allegations, on the basis of his own
9 admitted behavior.

13 Q Why is it -- why is it repugnant to restore
14 Pastor Johnny Hunt to the ministry?

15 A Well, I think it's contrary to what the Bible
16 teaches in First Timothy and in Titus concerning pastoral
17 qualifications. And I also think that this form of doing
18 it is contrary to Baptist practice for 400 years with
19 regard to how people wind up being ordained in the
20 ministry. It's a departure from Baptist history and
21 Baptist belief.

22 Q What are the -- what pastoral qualifications
23 are at issue here, sir?

24 A Well, the -- I can -- is it okay for me to --
25 to take my iPad and just --

1 Q No. I just want you to tell us your memory.
2 You -- you said that it -- that this is repugnant because
3 it -- it flies in the face of pastoral qualifications.

4 What qualifications makes this repugnant?

5 A So I could do better if I could read the Bible
6 that talks about those qualifications. But I -- it calls
7 upon people who are pastors to be people who are above
8 reproach, who have been tested and -- and without sin,
9 have been -- have been found -- people that are qualified
10 to be holding that office. It -- it -- it makes a number
11 of statements.

12 Q Well, sir, you -- you testi- -- you tweet to
13 the world that this is a repugnant act. Well, you're
14 saying that -- you had nothing other than allegations
15 , right?

16 MR. PIETSCH: Object to the form.

17 MR. BESEN: Object to form.

18 MS. KLEIN: Objection; form.

19 A Actually, I testified contrary to that. I said
20 that what he had admitted to in his fourth statement in
21 response to these allegations, his own statement, his own
22 confession about what he had done --

23 Q (BY MR. MacGILL) What were --

24 A -- I believe is in violation of the idea that
25 he's above reproach and -- and is fit to be restored to

1 A ministry.

2 Q So what about his -- what about his statement
3 that -- what in his statement is repugnant?

4 A I didn't say his statement was repugnant. I
5 said this means of restoration is a repugnant act.

24 Q And you wanted to defrock Johnny Hunt after
25 reading the Guidepost report because you believed

1 yourself that he was guilty of some kind of sexual abuse;
2 is that correct?

3 A No. After I read his fourth statement about
4 what he had done, I believed that he was no longer
5 qualified to serve as pastor.

22 Q Now, you said when you were talking previously
23 when you were -- when you were speaking about pastoral
24 qualifications, you remember you were indicating -- you
25 indicated that the standard of pastoral qualifications

1 that you find in the -- in the Bible would be somebody
2 who is above reproach. Do you remember that, generally?

3 A I do.

4 Q And someone who had been tested. Do you
5 remember that?

6 A I do.

7 Q And somebody without sin. Do you remember
8 that?

9 A Well, I could do better if I could actually go
10 to those Bible verses and read them. But yes, they had
11 been tested and passed the test, yes.

12 Q But also, sir, are you saying that to be
13 qualified to be a pastor you have to be without sin?

14 A No, I didn't say that. I didn't -- no, I don't
15 believe that you have to be sinless. Nobody would
16 qualify to be a pastor under that --

17 Q That's right. No one would qualify to be a
18 pastor that you know of in the history of your some
19 decades of being a Baptist pastor. Every Baptist pastor
20 that you know of has sinned in one way or another, right?

21 A Sure.

22 Q Yourself included?

23 A Yes.

24 Q Right.

25 And so the type of sins that you may have

1 may be different and distinct from the allegations
2 involved in this case; is that right?

3 A Well, they are, yes.

4 Q Well, fair. Fair enough.

5 But with respect to the -- the sins that
6 you have, you're saying that the sins that you have
7 committed in your life, sir, are distinct from and
8 excusable as compared to the sins of Pastor Johnny Hunt?

9 MR. PIETSCH: Object to the form.

10 You can answer.

11 A I'm saying that the standards for pastoral
12 qualification in the New Testament highlight specific
13 things.

14 Q (BY MR. MacGILL) What specific things -- what
15 specific sins, sir, are highlighted that would be as sins
16 that would be disqualifying?

17 A I believe, and I think the Southern Baptist
18 Convention has said, that sexual misconduct of this kind
19 would be something that would be -- that would be
20 disqualifying.

21 Q Sexual misconduct of what kind, sir?

22 A Sexual -- sexual misconduct with someone else's
23 wife contrary to your own wife. Someone who is the wife
24 of a fellow pastor. I think all of these things are
25 highly problematic.

1 Q Okay. And you say disqualifying?

2 A I think so, yes.

3 Q Well, you say you think so. If you --

4 A Well, it's my opinion.

5 Q -- and you -- all right.

6 But where -- how do you ground them?

7 Where is it grounded in -- in the SBC or in the polity
8 where this type of alleged misconduct disqualifies one
9 from being a pastor?

10 A I specifically said that I don't have the
11 authority to declare whether someone is or is not
12 disqualified, but I'm giving my opinion. My opinion is
13 formed on the basis of years of preaching, years of
14 studying these passages of scripture, and also based upon
15 academic training about pastoral ethics --

16 Q Well, sir --

17 A -- and about standards --

18 Q What is the standard? Tell -- tell this Court
19 how -- what the standard was for your opinion on the --
20 the alleged sins of Pastor Johnny Hunt as compared to
21 other sins.

22 A I think the --

23 Q How do you distinguish as a -- as a standard
24 between disqualifying sins in terms of being a pastor and
25 sins that are not disqualifying?

1 MR. PIETSCH: Object to the form.

2 You can answer.

3 A By application of the relevant passages of
4 scripture and by application of standards of pastoral
5 ethics that I was taught in seminary.

6 Q (BY MR. MacGILL) What specific relevant
7 scripture did you have in time -- in mind when you wrote
8 your blog?

9 A First Timothy Chapter 3, selected verses
10 contained in there, and selected verses contained in the
11 Book of Titus, as well as Jesus' general teachings
12 about -- about sexual immorality and about what
13 constitutes adultery and the severity of that.

14 Q Okay. Anything else?

15 A No. I think that -- that comes close to
16 summarizing, yeah.

17 Q All right. Now, what other sins fall as
18 disqual- -- or qualify as disqualifying sins under the
19 relevant scripture of the first -- of the citations that
20 you gave?

21 A Greed and -- and, you know, somebody steals
22 money from a church or I think somebody were caught
23 embezzling money, you know, in another aspect of their
24 personal life, that's something that would be
25 disqualifying. That's mentioned in all of the relevant

1 passages.

2 I think if somebody were divisive and
3 quarrelsome as a general trait of their character, that
4 would be something that would be disqualifying as well.

5 I believe that divorce is disqualifying.
6 That if someone has divorced their wife, that that's --

7 Q From being a pastor?

8 A Disqualifies them from being a pastor, yes.

9 Q What about pride; would that also be a
10 disqualifier?

11 A So, gosh, it would really help if I could look
12 at the Bible.

13 Q Well, sir, I've got -- I've got a lot I want to
14 talk to you about on what the Bible has to say, but I
15 just want to know before we get there.

16 Is pride disqualifying or not in terms of
17 a sin that would disqualify a pastor from being a humble
18 churchman who can be at the pulpit and give counsel,
19 guidance, and pastoral comfort to people?

20 MR. PIETSCH: Object to the form.

21 You can answer.

22 A I don't recall that in that way being listed as
23 a pastoral qualification.

24 Q (BY MR. MacGILL) Let's just work with the word
25 "pride." Sir, would pride be disqualifying from -- in

1 terms of pastoral qualification?

2 MR. PIETSCH: Object to the form.

3 You can answer if you know.

4 A No, I don't think so.

5 Q (BY MR. MacGILL) You don't think so?

6 Is humility an important part of being a
7 pastor?

8 A Yes, I think so.

9 Q Is humility, sir, an important part of being
10 able to be a pastor that can discharge his duties in the
11 Baptist religion?

12 MR. PIETSCH: Object to the form.

13 You can answer.

14 A I -- yes, I think humility is a good thing for
15 any Christian to have, and it enhances your walk with the
16 Lord.

17 Q (BY MR. MacGILL) As compared to one who is a
18 humble churchman on the one hand and one who is full of
19 pride on the other, does one who is full of pride
20 disqualify himself, sir, based on biblical teachings that
21 you are aware of from being a pastor?

22 MR. PIETSCH: Object to the form.

23 You can answer.

24 A No, I don't think so.

15 Q (BY MR. MacGILL) And just as we go into
16 further to what you did, sir, with respect to your own
17 conduct, would you -- would you say that if you yourself
18 have been -- have given false testimony as to your
19 neighbor, in this case Pastor Johnny Hunt, that you
20 should be disqualified from being a pastor?

21 MR. PIETSCH: Object to the form.

22 A No.

23 Q (BY MR. MacGILL) Okay. So a violation of a
24 Commandment would not be a reason to take away a pastor's
25 ministry; is that right?

1 MR. PIETSCH: Object to the form.

2 You can answer.

3 A The qualifications for pastoral ministry are
4 given in First Timothy Chapter 3 and in Titus Chapter 1,
5 and those are the things that we refer to when we're
6 trying to identify qualifications for pastoral ministry.

7 Q (BY MR. MacGILL) And qualifications do not
8 include abiding by the Ten Commandments; is that right?

9 MR. PIETSCH: Object to the form.

10 A That's right. Those are not listed -- the Ten
11 Commandments is not listed in either of those passages.

12 Q (BY MR. MacGILL) Okay. So any pastor could
13 violate any one or several of the Ten Commandments and
14 still be qualified, in your judgment, to be a pastor in a
15 Baptist church?

16 A That is not what I said.

17 Q How many Commandments can -- which Commandments
18 would -- violation of which Commandments would disqualify
19 a pastor and deem that pastor not qualified to serve in
20 the Baptist ministry?

21 MR. PIETSCH: Object to the form.

22 You can answer.

23 A Well, it's not related to that passage of
24 scripture at all. It's related to the list of
25 qualifications that are given in First Timothy Chapter 3

1 and in Titus Chapter 1.

2 Q (BY MR. MacGILL) So pas- -- pastor
3 qualifications have no reference to the Ten Commandments;
4 is that your testimony?

5 MR. PIETSCH: Object to the form.

6 You can answer.

7 A That's the text and scripture. There's no
8 mention of the Ten Commandments in either of those
9 passages about pastoral qualifications.

10 Q (BY MR. MacGILL) So if a pastor violates one
11 of the Commandments, are you saying that pastor is
12 qualified to be a pastor in the Baptist church?

13 MR. PIETSCH: Object to the form.

14 You can answer.

15 A I'm saying that the qualifications for being a
16 pastor are listed in the two passages that I have given
17 to you. That's -- that's where they're found.

18 Q (BY MR. MacGILL) It's an easy question, sir.
19 I'll ask it a third time.

20 If a --

21 MR. PIETSCH: Object to the
22 characterization.

23 Q (BY MR. MacGILL) -- pastor violates any one of
24 the pastor -- any one of the Ten Commandments, is that
25 pastor qualified to serve as a Baptist pastor?

1 MR. PIETSCH: Object -- object; asked and
2 answered.

3 You can answer.

4 A It's not an -- it's not an easy question. It's
5 not a relevant question. The qualifications for serving
6 as a pastor are found in First Timothy 3 and Titus
7 Chapter 1. Some things that would be listed in there,
8 violating some of the Ten Commandments would violate
9 those. And some of the Ten Commandments --

10 Q Would violate what?

11 A Huh?

12 Q Would violate what?

13 A So the pastoral qualifications say that you
14 should not be a quarrelsome person. And I would say that
15 if you murdered someone, that would very likely be
16 something that would indicate that you were quarrelsome.

17 Q All right. So --

18 A It's -- it's actually really quite complicated.
19 The pastoral qualifica- -- qualifications are listed in
20 those two passages of scripture. And there's -- the
21 things that are listed in Exodus 20 as the Ten
22 Commandments may or may not implicate any one of those
23 things that are listed there in First Timothy 3 or Titus
24 Chapter 1.

25 Q Well, sir, what about -- so you indicated that

1 Pastor Hunt's statement -- his own statement made it so
2 that he was not qualified to be a pastor, right?

3 A I did, yes.

4 Q What portion of his statement made him not
5 qualified to be a pastor specifically?

6 A Well, the statement in which he said he had
7 consensual sexual interaction with -- with another man's
8 wife.

9 Q What -- what is the text that indicates that
10 that statement specifically that you're relying on makes
11 Pastor Johnny Hunt not qualified?

12 A It says that he's supposed to be the husband of
13 one wife. It says that -- how can a man who doesn't
14 manage his own household manage the house of God? Most
15 of all, it says that he has to be above reproach. And I
16 think it's difficult to say that somebody is above
17 reproach if they have done something like that that --
18 that -- that could disqualify them from other professions
19 even other than being a pastor.

20 Q Consensual sexual interaction with another
21 man's wife, that is the sole basis for him being -- for
22 Pastor Johnny Hunt being disqualified from being a
23 pastor, in your judgment?

24 A Yes.

25 Q And with respect to restoration, is that an

1 act, according to you, that is beyond restoration in the
2 Baptist faith?

3 MR. PIETSCH: Object to the form.

4 You can answer.

5 A Just asking for my opinion about that?

6 Q (BY MR. MacGILL) Yes.

7 A Yes, in my opinion, it is.

8 Q Okay. What else is -- what else would qualify
9 as an act which -- for which there could be no
10 restoration in the Baptist faith?

11 MR. PIETSCH: Object to the form.

12 You can answer.

13 A I'm taking a moment to think about your
14 question.

15 Particularly when you talk about the
16 Baptist faith, at the end the -- the fact of the matter
17 is there are a lot of different Baptist groups. They
18 differ with one another about what pastoral
19 qualifications are, and within the Southern Baptist
20 Convention, individual people differ with one another
21 about what the qualifications are for pastoral office.

22 I've testified earlier that I believe that
23 divorce is disqualifying for people who would serve as a
24 pastor. Once you have been divorced, it's hard to get
25 undivorced. So that's generally something that becomes,

1 apart from maybe really egregious circumstances, if you
2 reconcile with your wife and went back into your
3 marriage, that that would be something that I think is a
4 permanent disqualification.

5 That's -- that's my theological opinion,
6 and it's also the position of the church I grew up in and
7 the church I lead now. But that doesn't make it
8 something handed down from on high as a tenet of the
9 Baptist faith. It just makes it my theological opinion
10 in reading these scriptures.

18 Q Now, changing topics here about Pastor Johnny
19 Hunt and -- and his continued ministry. What church did
20 Pastor Johnny Hunt begin preaching at after the report
21 was published?

22 A I think he's preached in multiple places.

23 Q Did he preach at the Hiland Park Church?

24 A Yes.

25 Q Okay. Let's look at the next exhibit.

1 (Exhibit 46 marked.)

2 Q (BY MR. MacGILL) Sir, can you tell us what
3 Exhibit 46 is?

4 A So I have Document 19. This appears to be an
5 inquiry letter from the SBC Credentials Committee to
6 Hiland Park Baptist Church.

7 Q I believe that says February 1, 2022. But is
8 the correct date February 1, 2023?

9 A Well, February 1, 2022 would not make much
10 sense, so I -- I would assume that that's a typographical
11 error.

12 Q Okay. And you see here in the language "We
13 write to notify you." Do you see that? The first
14 sentence.

15 A I do.

16 Q "The Committee has received a" -- "a request to
17 consider the relationship between Hiland Park Baptist
18 Church in Panama City, Florida and the Southern Baptist
19 Convention." Do you see that?

20 A I do.

21 Q And then there's reference to Pastor Johnny
22 Hunt in the third paragraph. Do you see that?

23 A I do.

24 Q And it says specifically, "Johnny Hunt, an
25 individual who has been credibly accused of sexual abuse,

1 according to standards adopted by the Convention." Do
2 you see that language?

3 A I do.

4 Q And who is the author -- who signed this
5 letter?

6 A The SBC Credentials Committee.

7 Q Okay. Now, I want to be specific, sir, about
8 the words used in the letter from -- and the S- -- the
9 SBC Credentials Committee is part of the SBC; is that
10 correct?

11 A The SBC Credentials Committee is a committee of
12 the Southern Baptist Convention.

3 Q (BY MR. MacGILL) Well, sir, you -- now you're
4 taking yet a new tack. You're taking a formal letter
5 approached through your own Credentials Committee and now
6 seeking to stop him from preaching actively through this
7 letter, right?

8 MR. PIETSCH: Object to the form.

9 A The committee, not me, sent a letter responding
10 to a request, a submission that they were given. They
11 didn't take any action here.

12 Q (BY MR. MacGILL) Did you have --

13 A They just sent an inquiry.

14 Q Did you have -- did you approve this letter?

15 A No.

16 Q Who approved this letter if it wasn't you, sir,
17 that sent out a letter like this? Who -- who was in
18 charge of making a decision whether to send such a thing
19 at the SBC?

20 A The SBC -- I'm sorry.

21 MR. PIETSCH: Object to the form.

22 You can answer.

23 A The SBC Credentials Committee. I -- I do not
24 meet with them. They don't notify me of anything --

25 Q (BY MR. MacGILL) Who was the chairman of the

1 committee at this time, sir?

2 A I don't know.

3 Q Did you see this letter prior to it going out?

4 A No.

5 Q So now we have the SBC making a statement,
6 "Johnny Hunt, an individual who has been credibly accused
7 of sexual abuse, according to standards adopted by the
8 Convention." Do you see that?

9 MR. PIETSCH: Object to the form or
10 characterization.

11 You can answer.

12 A I see the statement.

13 Q (BY MR. MacGILL) So now it's not just you
14 making statements about Johnny Hunt. It's the
15 Credentials Committee of the SBC now stating, "Johnny
16 Hunt, an individual who has been credibly accused of
17 sexual abuse, according to standards adopted by the
18 Convention." Do you see that?

19 MR. PIETSCH: Object to the
20 characterization and the form of the question.

21 You can answer.

22 A I believe what they're doing there is stating
23 the nature of the concern that was raised in the
24 complaint or in the submission that came to them.

25 Q (BY MR. MacGILL) This is a statement of fact

1 written in a letter, quote, that "Johnny Hunt, an
2 individual who has been credibly accused of sexual abuse,
3 according to standards adopted by the Convention."

4 Do you agree that's a factual statement,
5 sir?

6 A I do not.

7 Q Okay. What would you characterize that as?

8 A They received a request. The information that
9 they received raised this concern. So the person who
10 submitted this request to the Credentials Committee, I
11 think they're the ones who characterized the concern in
12 this way.

20 Q Well, wait a minute, sir. You have a
21 Credentials Committee writing about credibly accused, and
22 there has to be a determination that under -- under this
23 standard that the standard is met before such a statement
24 can be made by the SBC, right?

25 MR. PIETSCH: Object to form.

1 MR. BESEN: Object to form.

2 MR. PIETSCH: You can answer.

3 A The SBC didn't make the statement. The
4 Credentials Committee did not state that he had been
5 credibly accused. The Credentials Committee stated that
6 they had received a request that raised the concern that
7 he might have been credibly accused and might -- and that
8 this church might have been asking him to preach.

9 It's not a judgment letter. It's an
10 inquiry letter.

11 MR. PIETSCH: Can we do a restroom break
12 when you get a chance?

13 MR. MacGILL: Ask one more question if you
14 don't mind, Matt.

15 Q (BY MR. MacGILL) Sir, looking back at
16 Exhibit 46.

17 A Which one is that?

18 Q That is the Credentials Committee, Southern --
19 strike that.

20 Exhibit 46, sir, is the Southern Baptist
21 Convention --

22 A Document 19?

23 Q Correct. Yes, sir.

24 A Okay.

25 Q Please tell us when you're there.

1 A I'm there.

2 Q Let's read together, and we'll put this on the
3 ELMO system for the jurors to see this as we read this
4 along.

5 "The information we received raises the
6 concern that Hiland Park Baptist Church may be acting in
7 a way that is inconsistent with the Convention's beliefs
8 regarding sexual abuse due to the church platforming
9 Johnny Hunt," comma, "an individual who has been credibly
10 accused of sexual abuse," comma, "according to standards
11 adopted by the Convention, unquote."

12 Do you see that?

13 A I do see that.

14 Q Are you denying that the SBC reported that
15 Johnny Hunt was, quote, an individual who has been
16 credibly accused of sexual abuse according to the
17 standards adopted by the Convention, unquote?

18 MR. PIETSCH: Object to the form.

19 MR. BESEN: Object to form.

20 MR. PIETSCH: You can answer.

21 A I'm just saying that I think this paragraph is
22 talking about the nature of the complaint that was sent
23 to the Credentials Committee.

5 Q (BY MR. MacGILL) All right. Now, sir, I want
6 to ask you -- I want to go back to a topic that we talked
7 about earlier today, and that is this topic of pastoral
8 -- pastoral qualifications. Do you remember that?

9 A I do.

10 Q Okay. And you cited in connection with that --
11 those qualifications different biblical citations, did
12 you not?

13 A I -- I think I did, yes.

14 Q Which -- what was the biblical citation, sir?

15 A Well, I've asked to look for them. But it's
16 First Timothy Chapter 3 contains qualifications both for
17 deacons and for people who serve in what's referred to
18 there as the office of overseer. Baptists take the
19 Office of Overseer and the Office of Elder, which is
20 mentioned in Titus, I think Chapter 1, and -- and the
21 word "pastor" are all to be different titles that refer
22 to the same position.

23 Q All right. And with respect to pastoral
24 qualifications, if a pastor is prideful or somebody who
25 is lifted up with pride, would that be -- would that be a

1 disqualification of a pastor, that is the pastor would
2 not meet qualifications specifically?

3 MR. PIETSCH: Object to the form.

4 You can answer.

5 A Would it be a bad thing for me to look at
6 the --

7 Q (BY MR. MacGILL) Well, I mean, just do -- do
8 you recall that, first of all? I'm ready to talk to you
9 about some specifics here.

10 Do you recall that, sir, would pride be
11 disqualifying under this pastoral qualification section
12 of Tim- -- of the Timothy citation?

13 A Well -- well, I said when you asked before that
14 I would like to look and see. And I -- I take it I can't
15 do that; is that correct?

16 Q Well, you -- you might be able to. Let me give
17 you a quote.

18 Do you remember, yes or no? I mean,
19 you -- you were one to --

20 A So I would be permitted to look, is that --

21 Q When we get there.

22 A Does that violate the rules if I look at --

23 Q No.

24 A Then I'm going to look.

25 Q Yes or no without looking, sir.

1 A No, I'm going to look.

2 MR. MacGILL: Okay. So I'm going show the
3 -- let the record reflect that the witness is referring
4 to a Bible --

5 MR. PIETSCH: Here. Just hold on a
6 second. Hold on a second.

7 So just so we're clear, the question
8 that's being asked is to his --

9 MR. MacGILL: Recollection.

10 MR. PIETSCH: -- recollection of that
11 portion of the Bible, whether or not it says the -- or
12 stands for the proposition that you're asserting. Is
13 that what the question is?

14 MR. MacGILL: Would one lift- -- the
15 question -- specific question: "Do you recall, sir, that
16 if one is lifted up by pride, that that would be a
17 pastoral disqualification?"

18 MR. PIETSCH: Okay. So you can -- without
19 looking, you can answer whether or not you recall --

20 THE WITNESS: Okay.

21 MR. PIETSCH: -- one way or the other.

22 THE WITNESS: I do not recall it one way
23 or the other.

24 Q (BY MR. MacGILL) All right. I'm going to read
25 to you a section of Timothy and ask if you remember this

1 section, and I'm referring to Timothy Chapter 3. And
2 this is referring to one desiring the office of a bishop,
3 which I think is what you're referring to in Chapter 3;
4 is that right?

5 A Yes, an overseer.

6 Q Okay. And in the Baptist faith that would be
7 the equivalent of a pastor --

8 A Uh-huh.

9 Q -- of a local church, right?

10 A Uh-huh.

11 Q Now, the -- the words I'm -- I want to focus on
12 are the following: "Not a novice, lest being lifted up
13 with pride, he" -- "he fall into the condemnation of the
14 devil. Moreover, he must have a good rap- -- report of
15 them which are without, lest he fall into reproach in the
16 snare of the devil."

17 Is that one of the portions that you're
18 referring to?

19 MR. PIETSCH: I'm going to object to the
20 form of that question.

21 You can answer if you understand it.

22 Q (BY MR. MacGILL) Let me restate. I'm going to
23 make -- give you a quotation.

24 A It's not necessary to restate it --

25 Q Okay.

1 A -- I don't think.

2 Q Okay.

3 A I think you're reading from the King James
4 version; is that correct?

5 Q Yes?

6 A Okay. So I think the qualification there is
7 that he not be a novice. And it says the reason why it
8 shouldn't be someone -- the King James version word there
9 is novice, although the -- the word there in Greek just
10 means not -- not someone who is -- who is a new convert.
11 And so it doesn't give pride's qualification that says
12 that -- don't -- the qualification is not somebody who is
13 brand new to the faith. The worry is that that would
14 cause him to be lifted up by pride.

15 Q Is one lifted up by pride a person who may fall
16 into condemnation of the devil, sir?

17 MR. PIETSCH: Object to the form.

18 You can answer if you know.

19 A The -- the concern there is that a new believer
20 placed into the office of pastor, elder, overseer,
21 bishop, as it is referred to there, could be someone who
22 is lifted up by pride; and a result of that could be that
23 he could fall into condemnation of the devil.

1 STATE OF TEXAS)

2 I, Kelly Hassell, RPR, CLR, CSR in and for the State
3 of Texas, do hereby certify that, pursuant to the
4 agreement hereinbefore set forth, there came before me on
5 the 19th day of March, A.D., 2024, at 9:19 a.m., at the
6 offices of Bradley Arant Boult Cummings LLP, located at
7 Fountain Place, 1445 Ross Avenue, Suite 3600, in the City
8 of Dallas, State of Texas, the following named person, to
9 wit: CHRISTOPHER BART BARBER, who was by me duly
10 cautioned and sworn to testify the truth, the whole truth
11 and nothing but the truth, of his knowledge touching and
12 concerning the matters in controversy in this cause; and
13 that he was thereupon carefully examined upon his oath,
14 and his examination was reduced to writing under my
15 supervision; that the deposition is a true record of the
16 testimony given by the witness, same to be sworn to and
17 subscribed by said witness before any Notary Public,
18 pursuant to the agreement of the parties; and that the
19 amount of time used by each party at the deposition is as
20 follows:

21 Mr. MacGill - 4 hours, 13 minutes;

22 I further certify that I am neither attorney or
23 counsel for, nor related to or employed by, any of the
24 parties to the action in which this deposition is taken,
25 and further that I am not a relative or employee of any

1 attorney or counsel employed by the parties hereto, or
2 financially interested in the action.

3 In witness whereof, I have hereunto set my hand and
4 affixed my seal this 27th day of March, A.D., 2024.

5 I further certify that before the completion of the
6 deposition, the deponent and/or a party did not request
7 to review the transcript pursuant to Federal Rule
8 30(e)(1).

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-----*Kelly Hassell*-----
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